

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE WILL COUNTY LOCAL)	
174 CARPENTERS PENSION TRUST FUND)	
and WILL COUNTY LOCAL 174 WELFARE)	
FUND,)	
)	No. 18 CV 4346
Plaintiffs,)	
)	Judge: Norgle
v.)	
)	Magistrate Judge Gilbert
PROSTAR SURFACES, INC., a Wisconsin)	
Corporation,)	
)	
Defendant.)	

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COME the Plaintiffs, by and through their attorneys, and in their Motion for Judgment in Sum Certain, state as follows:

1. Plaintiffs filed their Complaint on May 3, 2018, seeking a judgment on an ERISA fringe benefit contributions audit.
2. Plaintiffs served Defendant on July 25, 2018.
3. Defendants failed to answer or otherwise plead to Plaintiffs' Complaint within the 21 days afforded by rule.
4. Defendants are in default.
5. Per the affidavit of Plaintiffs' auditor, Defendant is delinquent to the Plaintiff Funds in the following amounts: \$25,682.44 in contributions; \$2,568.24 in liquidated damages; and \$1,389.10 in audit costs. See Ex. A.
6. Per the affidavit of Plaintiffs' counsel, Plaintiffs have incurred \$1,650.00 in costs and attorneys' fees in the instant action and the attempted collection of Defendant's delinquency. See Ex. B.

WHEREFORE, Plaintiffs ask this Court to enter the Order attached to this Motion as Exhibit C.

Respectfully submitted,

**TRUSTEES OF THE WILL COUNTY LOCAL
174 CARPENTERS, et al.**

By: s/Andrew S. Pigott
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